



## Law Office of Angus James Bell

30 Wall Street, 8<sup>th</sup> Floor New York, New York 10005

Tel: (212) 804-5765 Fax: (718) 504-6351

Email: ajamesbelllaw@gmail.com

September 8, 2021

Via Email

Hon. Kimba M. Wood  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

MEMO ENDORSED

Re: *United States v. Erik Feliz, 21Cr.12(KMW)*

Dear Judge Wood:

I am CJA appointed counsels for Mr. Erik Feliz and write this letter with the consent of the Government to request an adjournment of our upcoming sentencing hearing that is scheduled for September 15<sup>th</sup> at 10 am. After consulting with the Court's Clerk, I understand that November 10<sup>th</sup> is available on the Court's calendar for this purpose.

If granted the additional time will allow counsel to continue gathering the letters of support and other mitigation materials that will be essential to our sentencing submission and will ultimately be presented to the Court for a sentence that is sufficient but not greater than necessary to comply with paragraph (2) of 18 U.S.C. § 3553. Please also know that I consulted with Mr. Feliz regarding this application and he believes that his interests are best served if we have the additional time to prepare for sentencing.

Should the Court grant this request, counsel is requesting that the hearing be adjourned to November 10<sup>th</sup> or to a date thereafter that is convenient to the Court. This is counsel's first request to adjourn Mr. Feliz's sentencing hearing.

Thank you in advance for any and all consideration of this request. We will await further instructions from the Court on this matter.

Sentencing is adjourned to November  
10, 2021, at 11:00 a.m. Defendant's  
Submission is due by October 27.  
Government submission is due by  
November 3.

Respectfully submitted,

A. James Bell  
A James Bell, Esq.

Kimba M. Wood 9/9/21  
SO ORDERED